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Safeclick, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

SAFECLICK, LLC, an Iowa limited liability
company,

Plaintiff /
Counterclaim Defendant,

vs.

VISA INTERNATIONAL SERVICE
ASSOCIATION, a Delaware corporation, and
VISA USA, INC., a Delaware corporation,

Defendants /
Counterclaim Plaintiffs

Case No. C03-05865 SBA (JCS)

**PLAINTIFF'S ADMINISTRATIVE
REQUEST TO FILE DOCUMENTS
UNDER SEAL AND
ORDER GRANTING PLAINTIFF'S
REQUEST PURSUANT TO CIVIL L.R.
79-5(B)**

Date: September 20, 2005

Time: 1:00 p.m.

Dept: Courtroom 3, 3rd Floor

Pursuant to Civil Local Rule 79-5(B), Plaintiff and Counterclaim Defendant Safeclick, LLC
("Safeclick") hereby requests *ex parte* an order to file under seal the following documents:

- Pages 5:14-22; 8:7-16,23-25; 10:6-16,18-21,25-27-11:19; 12:4-7,11-26; 13:12-14,17-25;
14:1-3,13-19; 15:4-7; 16:13-17:4; 17:8-12,18,22-24; 18:8-20:6; 20:9-13,20-21,26-28; 21:6-18,26-28;
22:2-21,25; and 23:7-10,18,26-28 of Safeclick's Memorandum in Opposition to Defendants' Motion for
Summary Judgment, lodged concurrently herewith;

• Page 2:9-18; Exhibits 4-6; 8-9; and 11 to the Declaration of Adam Mortara in Opposition to Defendants' Motion for Summary Judgment, lodged concurrently herewith; and

• Pages 1:23-24; 2:22-23; 3:1-4:8; 4:15-18; 6:8-20,25-27; 7:9-26; 8:2-3; 9:18-21; 10:3-12:2; 12:6-15:9; and 15:13-17:20 to the Declaration of Gene Tsudik in Opposition to Defendants' Motion for Summary Judgment, lodged concurrently herewith.

The above documents contain confidential and proprietary information concerning Safeclick's business products and operations. Good cause exists to file these documents under seal because Safeclick is likely to suffer economic and competitive harm if the information contained therein is disclosed to the public.

The above documents are properly filed under seal because Safeclick has designated them as "Confidential Information" pursuant to Paragraphs 1, 5, and 6 of the Stipulated Protective Order entered in this case by Magistrate Judge Joseph C. Spero on October 4, 2004.

Safeclick has filed redacted versions of the above-listed documents which exclude only that information which is confidential and protected from disclosure by the Stipulated Protective Order.

The Court, having considered the papers, and having reviewed the subject documents, finds that good cause is present, and it is accordingly ORDERED that the above-listed documents shall be filed under seal.

Dated: August 22, 2005

The Honorable Saundra B. Armstrong
United States District Court

